

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

IN RE DPP BEEF ANTITRUST
LITIGATION

Case No. 20-cv-1319-JRT-HB

This document relates to:

ALL CASES

DECLARATION OF NATHAN HODNE

I, Nathan Hodne, declare as follows:

1. I submit this declaration based on my personal knowledge and am competent to offer it.

2. I am currently employed by Tyson Fresh Meats as the Senior Vice President and General Manager of Value Added and Case Ready. I have held this role since January 2019. Prior to this role, I was the Senior Vice President of Case Ready from February 2018 to January 2019. I have been employed by Tyson for roughly thirty (30) years.

3. Between January 1, 2010 and the end of December 2020, Tyson operated three case ready plants in Sherman, Texas, Goodlettsville, Tennessee, and Council Bluffs, Iowa. These plants process both beef (sliced and ground) and pork products. The case ready plants are managed separately from Tyson's slaughter plants and operate as a unique business unit within the Tyson Fresh Meats company.


4. The case ready plants are not engaged in the procurement or slaughter of fed cattle.

5. The volume of product put through Tyson's case ready plants is generally based on orders from specific customers, which case ready forecasts to anticipate raw material needs; and volume is not tied to the anticipated volume of boxed beef being built at the slaughter plants. Customer orders are then filled by the case ready plants using boxed beef and pork purchased primarily from the Tyson slaughter plants, and trim purchased from the Tyson slaughter plants and other lean trim suppliers.

6. For the case ready plants, there is only a limited ability to store or hold raw ingredients or finished product before it needs to be shipped to customers. Case ready products are highly perishable food items, subject to strict food safety handling and transportation requirements. Because of limited shelf life, customers also demand product be shipped within days of production and may refuse older product.

I declare under penalty of perjury that the foregoing is true and correct.

EXECUTED this 4th day of August, 2022, in Springdale, Arkansas.

DocuSigned by:

5A4B1108DBEB436
Nathan Hodne